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From:        ROB WILSON
To:          RTPHUB:RTP10.RTPTSD:DOLL-DENNIS
Date:        12/18/95 12:29pm
Subject:     DRAFT MEMO - ISC3 MODIFICATIONS -Reply
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My recommendation was not to simply implement the code changes
from RTP Env. Assoc. that I had attached. I suggested that if
the change is made, it ought to be included in the ISC3 code with
a switch so that the user can decide how he/she wants to estimate
impacts. The default on the switch would be to zero out the
Complex I impacts associated with negative emission rates.
I don't understand the differences between your options #1 and
#3.
I see the options this way: Either we don't make code changes
(1a and 1b), or we do make code changes (2a and 2b)
1a.   Provide a warning message on SCRAM. (Your option #4)
1b.   Provide code changes on SCRAM for users to make the changes
if they want to. (Your option #2?)
2a.   Make changes to the ISC3 code, as I have recommended, with a
switch. Put the modified codes in the Review/Comment area for a
month to let users test the codes. Then, install the new codes
in place of the current ISC3.
2b.   Make changes to the ISC3 code, as I have recommended, with a
switch. Call it ISC3.1 or something else to distinguish it from
ISC3. Put the modified codes in the Review/Comment area. Begin
a Direct Final Rulemaking to change the GAQM to recommend ISC3.1
instead of ISC3.
3.   Take the GAQM out of the CFR, so we don't have to go through
a formal rulemaking process every time we need to make
inconsequential changes to the codes of the regulatory models.
Then, make changes, as needed, with appropriate public
notification.
What I think we should to is sort of 'all of the above.' We
should initiate an effort using in-house resources to make the
necessary code changes to ISC3. We should do quality assurance
and thorough testing of the modified code to make certain it
performs as intended. Since this make take OAQPS some time, we
should put a notice on SCRAM about this, and provide a copy of
the RTP Env. Assoc. code changes, so people can make the changes,
if they want to, in the meantime. Whether or not we need to go
through some formal process to make the modified ISC3 code the
official regulatory version of the model is up to you. I don't
see the need myself, but OAQPS may see it otherwise. If you
think some formal process to make the change over to the new code
is necessary, I suggest you consider using a Direct Final
Rulemaking process, rather than either waiting until Supplement
D, or putting this simple change out as a Notice of Proposed
Rulemaking. Finally, I can't help but reiterate my longstanding
position on the GAQM (my option #3): It is a guideline. and as
such it should NOT be in the CFR. This would make the process of
changing the GAQM and the Appendix A models easier and faster,
and it would reduce the amount of resources we waste in the GAQM
revision process.
Concerning your second issue: I don't see why ISC3 with Complex

I couldn't replace SHORTZ/LONGZ as the recommended models for urban complex terrain. There really is no technical support (that is, adequate model performance evaluation) for SHORTZ/LONGZ anyway. They were simply put in the GAQM at the time because they filled an applicability niche -- namely, a model with an urban switch that could be applied in complex terrain. ISC3 with Complex I can also fill that niche, and it is a lot more consistent with our current approach to regulatory modeling and convenient to use, so why not just make this simple change? Again, the fact that the GAQM is in the CFR is a major stumbling block here.
Give me a call if you have questions, or you would like to discuss this further.

CC: RTP10.RTPTSD.TIKVART-JOE, RTP10.RTPTSD.IRWIN-JOHN,...